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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER  
IN SUPPORT OF META PLATFORMS,  
INC.'S MOTION TO EXCLUDE  
TESTIMONY AND OPINIONS OF  
NICHOLAS ECONOMIDES**

Hearing Date: July 24, 2025  
Time: 10:00 a.m.  
Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I  
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this declaration  
4 in support of Meta's Motion to Exclude the Testimony and Opinions of Nicholas Economides.

5 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Abridged  
6 Expert Declaration of Nicholas Economides, Ph. D. in Support of Renewed Motion to Certify  
7 Consumer Class, dated May 24, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript  
9 from Nicholas Economides's merits deposition held on March 15, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript  
11 from Nicholas Economides's class certification deposition held on September 14, 2023.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the Expert  
13 Merits Report of Nicholas Economides, dated January 12, 2024.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the transcript  
15 from Rachel Banks Kupcho's deposition held on May 22, 2023.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript  
17 from Sarah Grabert's deposition held on April 24, 2023.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the transcript  
19 from Sarah Grabert's deposition held on April 25, 2023.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the transcript  
21 from Maximilian Klein's deposition held on May 31, 2023.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of a document  
23 produced in this litigation, bearing Bates number KLEIN-META\_AMAZON\_0007540.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of an article  
25 by Nicholas Economides, *Antitrust Issues In Network Industries* (May 2008).

26 12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts of Consumer  
27 Plaintiffs' Supplemental Responses and Objections to Interrogatory Nos. 15 and 16, dated  
28 February 15, 2023.



**SIGNATURE ATTESTATION**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta  
Sonal N. Mehta